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AMERICAN EXPRESS CENTURION BANK

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

MICHAEL ANDEREGG,)	Case No. 3:12-cv-06078-NC
)	
Plaintiff,)	[Assigned to the Hon. Nathanael Cousins]
)	
vs.)	
)	
AMERICAN EXPRESS CENTURION BANK;)	STIPULATION AND [PROPOSED]
AND DOES 1-20 INCLUSIVE,)	ORDER TO CONTINUE THE INITIAL
)	CASE MANAGEMENT CONFERENCE
Defendants.)	
)	Action Filed: October 17, 2012
)	
)	[Local Rule 6-1(b)]
)	
)	[Declaration of Lisa M. Simonetti filed
)	concurrently]
)	

WHEREAS, plaintiff Michael Anderegg (“Plaintiff”) filed his Complaint for Damages on October 17, 2012 in the Superior Court for the County of Alameda;

WHEREAS, on November 30, 2012, defendant American Express Centurion Bank (“Defendant”) removed the action to the United States District Court for the Northern District of California;

WHEREAS, Defendant filed its answer to Plaintiff’s Complaint on December 17, 2012;

WHEREAS, the Court has set the initial Case Management Conference for March 6, 2013 at 3:00 p.m. (Dkt. No. 2);

WHEREAS, due to a conflict of counsel on March 6, 2013, the parties have agreed to continue the initial Case Management Conference to March 27, 2013;

WHEREAS, pursuant to the Court’s Order Setting the initial Case Management Conference and ADR deadlines, if the Case Management Conference is continued, the other deadlines are continued accordingly;

WHEREAS, pursuant to Civil Local Rules 6-1(b) and 6-2, the parties may request an order changing a deadline that would extend deadlines set forth in the Local Rules or Federal Rules; and

WHEREAS, this Stipulation is made in good faith and not for purposes of delay.

[Stipulation Continued On Next Page]

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IT IS HEREBY STIPULATED by and between the parties, through their respective counsel of record, as follows:

(a) The date of the initial Case Management conference is continued from March 6, 2013 at 3:00 p.m. to March 27, 2013 at 3:00 p.m.;

(b) The other deadlines set forth in the Court's Order Setting the initial Case Management Conference and ADR deadlines are continued accordingly as follows: (i) the last day to meet and confer regarding initial disclosures, early settlement, ADR process selection and discovery plan, to file ADR Certification and to file either a Stipulation to ADR Process or Notice of Need for ADR Phone Conference is continued to March 6, 2013; and (ii) the last day to file a Rule 26(f) report, complete initial disclosures or state objection in Rule 26(f) Report and file Case Management Statement is continued to March 20, 2013.

IT IS SO STIPULATED.

Dated: February 12, 2013

STROOCK & STROOCK & LAVAN LLP
JULIA B. STRICKLAND
LISA M. SIMONETTI
KRISTINA A. DEL VECCHIO

By: /s/ Lisa M. Simonetti
Lisa M. Simonetti

Attorneys for Defendant
AMERICAN EXPRESS CENTURION
BANK

Dated: February 12, 2013

KAZEROUNI LAW GROUP, APC
ABBAS KAZEROUNIAN

By: /s/ Abbas Kazerounian
Abbas Kazerounian

Attorneys for Plaintiff
MICHAEL ANDEREGG

PROPOSED ORDER

PURSUANT TO THE STIPULATION, IT IS SO ORDERED.

Dated: February 13, 2013



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CERTIFICATION OF SERVICE

I hereby certify that, on February 12, 2013, copies of the foregoing **STIPULATION AND [PROPOSED] ORDER TO CONTINUE THE INITIAL CASE MANAGEMENT CONFERENCE** were filed electronically and served by U.S. Mail on anyone unable to accept electronic filing. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by facsimile to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's EM/ECF System.

By: /s/ Lisa M. Simonetti
Lisa M. Simonetti

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